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April 27, 2022

VIA ECF

Honorable Edgardo Ramos United States District Court Southern District of New York Thurgood Marshall United States Courthouse 40 Foley Square New York, NY 10007

> Re: Lopez, et al, v. P E C Group Ltd., et al, No.: 21 CV 8806 (ER)(KHP)

Dear Judge Ramos,

We represent Plaintiffs in the above-referenced matter. We write to respectfully inform the Court that Plaintiffs do not oppose Defendants' motion to amend their answer. (Dkt No. 17.) Plaintiffs respectfully request that—to the extent Defendants' amended answer only includes a new affirmative defense and does not in any way change the counterclaims Defendants already asserted—Plaintiffs' answer to the Defendants' counterclaim filed on January 24, 2022 (Dkt. No 11) be deemed to operative answer to the same counterclaims Defendants now wish to assert in their amended answer.

We thank the Court for its attention to this matter.

Respectfully submitted,

JOSEPH & KIRSCHENBAUM LLP

/s/ Josef Nussbaum

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cc: All Counsel of Record (via ECF)